

FILED

Mar 18 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	CASE NOS. CR 19-711 CRB AND
)	CR 19-0343 CRB
)	
v.)	STIPULATION AND [PROPOSED] ORDER RE
)	TEMPORARY RETURN OF PASSPORT TO
)	CINTHIA RODRIGUEZ
)	
CINTHIA RODRIGUEZ,)	
)	
Defendant.)	

Counsel for defendant Cinthia Rodriguez and the government stipulate as follows:

1. Ms. Rodriguez has been on pretrial release since December 24, 2019 and has complied with the conditions of her pretrial release since that time. Ms. Rodriguez is also on release from immigration custody.
2. Ms. Rodriguez surrendered her Honduran passport to U.S. Pretrial Services as a condition of release in 2019.
3. Ms. Rodriguez has requested use of her Honduran passport as identification in order to enroll her daughter in Oakland school and to obtain immigrant benefits.
4. The United States and U.S. Pretrial Services have no objection to Ms. Rodriguez obtaining her Honduran passport from U.S. Pretrial Services for a temporary period during which she

1 can use it for the above-referenced purposes.

- 2 5. The parties submit that the Court should order that Ms. Rodriguez shall receive her passport
3 for a 10-day period, effective as soon as U.S. Pretrial Services can accommodate, and shall
4 return it to Pretrial Services within 10 days of receiving it. If Ms. Rodriguez needs additional
5 time, the parties can submit an additional stipulation.

6
7 IT IS SO STIPULATED.

8 Dated: March 18, 2021

STEPHANIE M. HINDS
Acting United States Attorney

9
10 /s/ _____
SAILAJA PAIDIPATY
Assistant United States Attorney

11
12 Dated: March 18, 2021

13 /s/ _____
SHAWN HALBERT
Counsel for Cinthia Rodriguez

14
15 ~~PROPOSED~~ ORDER

16 For good cause shown, the Court HEREBY ORDERS that U.S. Pretrial Services shall provide
17 Ms. Rodriguez with her Honduran passport for a 10-day period, effective as soon as U.S. Pretrial
18 Services can accommodate, and shall return it to Pretrial Services within 10 days of receiving it.

19 IT IS SO ORDERED.

20
21 DATED: March 18, 2021

22 
HONORABLE THOMAS S. HIXSON
United States Magistrate Judge